

## **REMARKS**

Applicants respectfully traverse and request reconsideration.

It is alleged that the title of the invention is not descriptive. Applicants have amended the title.

Claims 1-24 and 27 stand rejected under 35 U.S.C. §101 as allegedly directed to non-statutory subject matter. Applicants have amended the claims. Accordingly, Applicants respectfully request withdrawal of the rejection.

Claims 1-27 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,629,097 (Keith). Keith is directed to displaying implicit associations among items in loosely structured data sets. In particular, Keith describes a system for discerning and displaying relational structure and conceptual similarities among items in a target group of data items. Root items are extracted from descriptions of the data items and are used to generate similarity measures among all data items in a group. Mathematical operations are used to transform the similarity measures into Euclidean coordinates such that all data items and all root terms can be simultaneously plotted as visual objects in a computer simulated three dimensional space. Users can access detailed information about displayed data items, including hyperlinks and URL links which serve to connect the user to original data sources represented by objects in the visual plot. As to claim 1, the office action cites column 18, lines 18-20 of Keith as allegedly teaching a knowledge container creator module capable of containing data representing raw data that is in one of a plurality of different formats. However, in this portion of the reference, it appears that Keith is describing myriad data sources in multiple formats, upon which the similarity engine and visualization tool can act. In contrast, the claim requires that the knowledge container creates data so that raw data is stored in different formats, it is linked with first and second descriptor item data. In contrast, Keith is referring to the sources of data being in multiple formats, not linked descriptor items that are linked

to the raw data item that is in one of a plurality of different formats as claimed. Accordingly, Applicants respectfully submit that the claim is in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter and are allowable at least for the reasons given with respect to claim 1.

As to claim 3, the office action alleges that Keith teaches to modify a template descriptor item and create knowledge transformation information by extrapolating data from the raw data item that in one of a plurality of different formats, citing to column 25, line 53 to column 26, line 19. However, Applicants respectfully submit that the cited portion teaches a very specific matrix representation. In contrast, the claimed knowledge container administrator causes the data management system to automatically create an instance of a knowledge container per the selected template and uses the available data structures to store the selected data. This is different from the matrix representation described. In addition, Applicants respectfully reassert the relevant remarks made above with respect to claim 1 and as such, this claim is also believed to be in condition for allowance.

The dependent claims are allowable at least as depending from an allowable base claim and also as adding novel and non-obvious subject matter.

As to claim 5, Applicants respectfully reassert the relevant remarks made above with respect to the other independent claims. Accordingly, this claim is also believed to be in condition for allowance.

The dependent claims are allowable at least as depending from an allowable base claim. In addition, the claims add additional novel and non-obvious subject matter. For example, claim 8 requires a base knowledge container update module that formats the first and second data descriptor items in XML knowledge container format. However, the cited portion of column 25, lines 40-47 describes using structure documents and XML documents as inputs to the similarity engine and

visualization system. In contrast, the claim uses XML as a representation for the knowledge container, which is for example, a single open knowledge repository.

In addition, for example, claim 9 requires among other things, a knowledge container administrator module that modifies the template descriptor item wherein the template descriptor item is used to provide one of three different knowledge containers namely a knowledge container for providing inputs for entering the context descriptor, a knowledge container for providing the inputs for searching a data descriptor item and a knowledge container for identifying key words. As such, Applicants respectfully request clarification if the rejection is maintained.

As to claim 23, Applicants respectfully reassert the relevant remarks made above with respect to claim 1 and as such, this claim is also believed to be in condition for allowance.

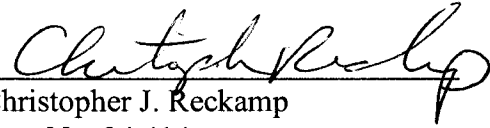
As to claim 25, the office action cites column 25, line 53 through column 26, line 19 as allegedly teaching among other things, a data access instruction descriptor that provides instructions on how to access raw data in addition to linking of the data descriptors as claimed. The cited portion of Keith refers to creating a matrix that can be used to identify similarity and compute scaling factors for the data items. In contrast, the claimed subject matter provides the functionality to link the raw data item to a descriptor of the type of transformation that can be (or has been) performed upon the data item. This is not only linked to the raw data, but is also a way to efficiently and openly represent the types of transformations that can be performed on certain types of data within the knowledge container. This can, among other things, increase the reusability of data sets. Accordingly, since the cited portion does not teach the claimed subject matter, this claim is also believed to be in condition for allowance.

As to claim 27, Applicants respectfully reassert the relevant remarks made above and as such, this claim is also believed to be in condition for allowance.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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